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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

**RESPONSE OF DEFENDANTS NATHAN KEAYS AND ECO EDGE ARMORING, LLC,
TO PENDING MOTIONS BY PLAINTIFF**

COMES NOW Phillip Paul Weidner of Phillip Paul Weidner & Associates, APC, on behalf of Defendants Nathan Keays and Eco Edge Armoring, LLC, and hereby responds to Plaintiff's motions as required by Court Order, at page 9 of 10, of Docket 9, as follows.

1. Said Defendants and their Counsel, do not make any admissions or concessions as to any culpability by said Defendants as to the allegations set out Plaintiff's Complaint, respecting any allegations of criminal conduct, fraud, RICO, etc.;
2. Defendants do, however, agree to non-oppose Plaintiff's Motion For Telephonic Participation and agree to the Court's Order in that regard;

3. Undersigned Counsel will appear at the hearing at 2:30 p.m. on December 26. It is anticipated: Counsel for the Defendants will agree to non-oppose paragraph one at page 10 of this Court's Order re Ex Parte Motion For Temporary Restraining Order at Docket 9, being extended in a Preliminary Injunction, with an anticipated further modification agreed to by Counsel for the Plaintiff and the Defendants Keays/Eco Edge Armoring, that the Defendant Nathan Keays may utilize a bank account for the receipt and disbursement as he sees fit of proceeds from any paychecks that he receives from the Municipality of Anchorage/Anchorage Police Department, with the name of his account and account number being provided to Counsel for the Plaintiff and the Court in an appropriate fashion;¹ b) Further, Counsel for the Keays/Eco Edge Armoring Defendants and Counsel for the Plaintiff are engaging in inappropriate discussions and investigating a possible further modification of paragraph one regarding the Defendant Keays Municipality of Anchorage/Anchorage Police Department retirement account with the Municipality of Anchorage/ Anchorage Police Department;
4. Thus, it is anticipated that Counsel for the Keays/Eco Edge Armoring Defendants will agree at the hearing, to an extension of paragraph 1 as so modified, and an extension of paragraph 2 at page 9 of 10, of the Temporary Restraining Order at Docket 9 to be incorporated into the Preliminary Injunction;
5. It is further anticipated that Counsel for the Defendants will agree to such provisions and Order(s), with the understanding that any Preliminary Injunction and or

¹ Defendant Keays has established an account (using funds not subject to paragraph 2 of the Temporary Restraining Order at Docket 9), and will tender to the Court under seal, a copy of the partial redacted check face as to the identifying numbers of the account.

Stipulations as stated, may be subject to appropriate motions, if necessary, for further modification.

RESPECTFULLY SUBMITTED this 23rd day of December, 2019.

WEIDNER & ASSOCIATES
Attorneys for Defendant

/s/ Phillip Paul Weidner
Phillip Paul Weidner, ABA No. 7305032

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2019, a copy of the foregoing was served electronically on the parties entered in this matter.

s/ Phillip Paul Weidner